

**EPA Superfund  
Record of Decision:**

**US NAVY AVIONICS CENTER  
EPA ID: IN4170023499  
OU 00  
INDIANAPOLIS, IN  
07/26/1999**

**Decision Document**  
for  
**AOC 6 - Building 2000**  
**Photography Laboratory**

**Naval Air Warfare Center**  
Indianapolis, Indiana



**Southern Division**  
**Naval Facilities Engineering Command**  
**Contract Number N62467-94-D-0888**  
**Contract Task Order 0012**

July 1999

**DECISION DOCUMENT  
FOR  
AOC 6 - BUILDING 2000 PHOTOGRAPHY LABORATORY**

**NAVAL AIR WARFARE CENTER  
INDIANAPOLIS, INDIANA**

**COMPREHENSIVE LONG-TERM  
ENVIRONMENTAL ACTION NAVY (CLEAN) CONTRACT**

**Submitted to:  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
North Charleston, South Carolina 29406**

**Submitted by:  
Tetra Tech NUS, Inc.  
661 Andersen Drive  
Foster Plaza 7  
Pittsburgh, Pennsylvania 15220**

**CONTRACT NUMBER N62467-94-D-0888  
CONTRACT TASK ORDER 0012**

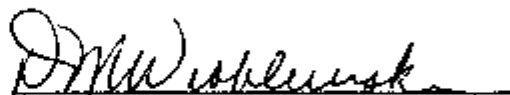
**JULY 1999**

**PREPARED UNDER THE SUPERVISION OF:**



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## ACRONYMS

AOC	Area of Concern
ARAR	Applicable or Relevant and Appropriate Requirements
BCT	BRAC Clean-up Team
BRAC	Base Realignment and Closure
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CIP	Community Involvement Plan
CFR	Code of Federal Regulations
COPC	Chemicals of Potential Concern
DCE	Dichloroethene
IDEM	Indiana Department of Environmental Management
IR	Installation Restoration
mg/kg	milligram per kilogram
NAVFAC	Naval Facilities Engineering
NAWC	Naval Air Warfare Center Command
NCP	National Contingency Plan
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyl
PCE	Tetrachloroethene
PRG	Preliminary Remediation Goal
RAB	Restoration Advisory Board
RBC	Risk Based Concentration
RI	Remedial Investigation
RCRA	Resource Conservation and Recovery Act
SOUTHDIV	Southern Division, Naval Facility Engineering Command
SSL	Soil Screening Level
TCA	1,1,1-Trichloroethane
TCE	Trichloroethene
USEPA	U.S. Environmental Protection Agency
USGS	United States Geological Survey
VOC	Volatile Organic Compound

## **1.0 DECLARATION OF THE DECISION DOCUMENT**

### **1.1 SITE NAME AND LOCATION**

**AREA OF CONCERN SIX (AOC6)  
PHOTOGRAPHY LABORATORY, BUILDING 2000  
NAVAL AIR WARFARE CENTER (NAWC) INDIANAPOLIS  
INDIANAPOLIS, INDIANA**

### **1.2 STATEMENT OF BASIS AND PURPOSE**

This Decision Document presents the selected remedial action for the photography laboratory in Building 2000 (AOC6) NAWC Indianapolis, Indianapolis, Indiana, developed in accordance with CERCLA, as amended by SARA, to the extent practicable, the National Contingency Plan. This decision is based on the administrative record for this Site, at the Warren Library, Indianapolis, Indiana.

The State of Indiana and the U.S. EPA concur on the selected remedy.

### **1.3 ASSESSMENT OF THE SITE**

This site presents no endangerment to public health, welfare, or the environment. No action is the selected remedy.

### **1.4 DESCRIPTION OF THE SELECTED REMEDY**


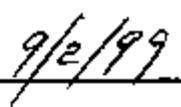

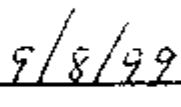

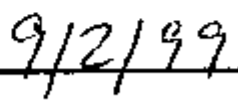
AOC 6 encompasses contamination in the former vehicle maintenance facility in Building 2000. Based on current Site conditions, it has been determined that future risk to human health and the environment would be within acceptable limits. Therefore, no further remedial action is planned.

### **1.5 STATUTORY DETERMINATION**

Because there are no risks associated with this site, no further action needs to be taken.

## 1.6 DECLARATION

The selected remedy is protective of human health and the environment, complies with Federal and State requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost-effective. This remedy utilizes permanent solutions and alternative treatment technologies to the maximum extent practical for this site.

 _____ Carl Loop, US Navy, Southern Division (SOUTHNAVFACENGCOM) BCT Member	 _____ Date
Concurrence:	
 _____ Denise Boone, USEPA, Region V BCT Member	 _____ Date
 _____ Sean Grady, Indiana Department of Environmental Management BCT Member	 _____ Date

## **2.0 DECISION SUMMARY**

### **2.1 SITE NAME, LOCATION, AND DESCRIPTION**

NAWC Indianapolis is located in Marion County, east of downtown Indianapolis within a predominantly residential/commercial area (See Figure 2-1). NAWC Indianapolis is bordered by East 21st Street to the north, Arlington Avenue to the west, East 16th Street to the south, and a small waterway, Windsor Branch, to the east. Most of the commercial establishments within the immediate vicinity of NAWC Indianapolis are located along East 21st Street or Arlington Avenue. Businesses in the area include gas stations, car washes, dry cleaners, and office buildings. The areas immediately beyond the businesses lining East 21st and Arlington Avenue are predominantly residential, as are the areas south and east of the NAWC.

In late 1995, the Department of Defense decided to place the NAWC Indianapolis on the base realignment and closure list. This initiated the conversion of the facility from a government-owned and operated facility to the private sector. The NAWC Indianapolis is currently under the direction of Raytheon, under lease from the City of Indianapolis, who, in turn, leases the property from the U.S. Government. Figure 2-2 shows a layout of NAWC Indianapolis and the location of AOC 6.

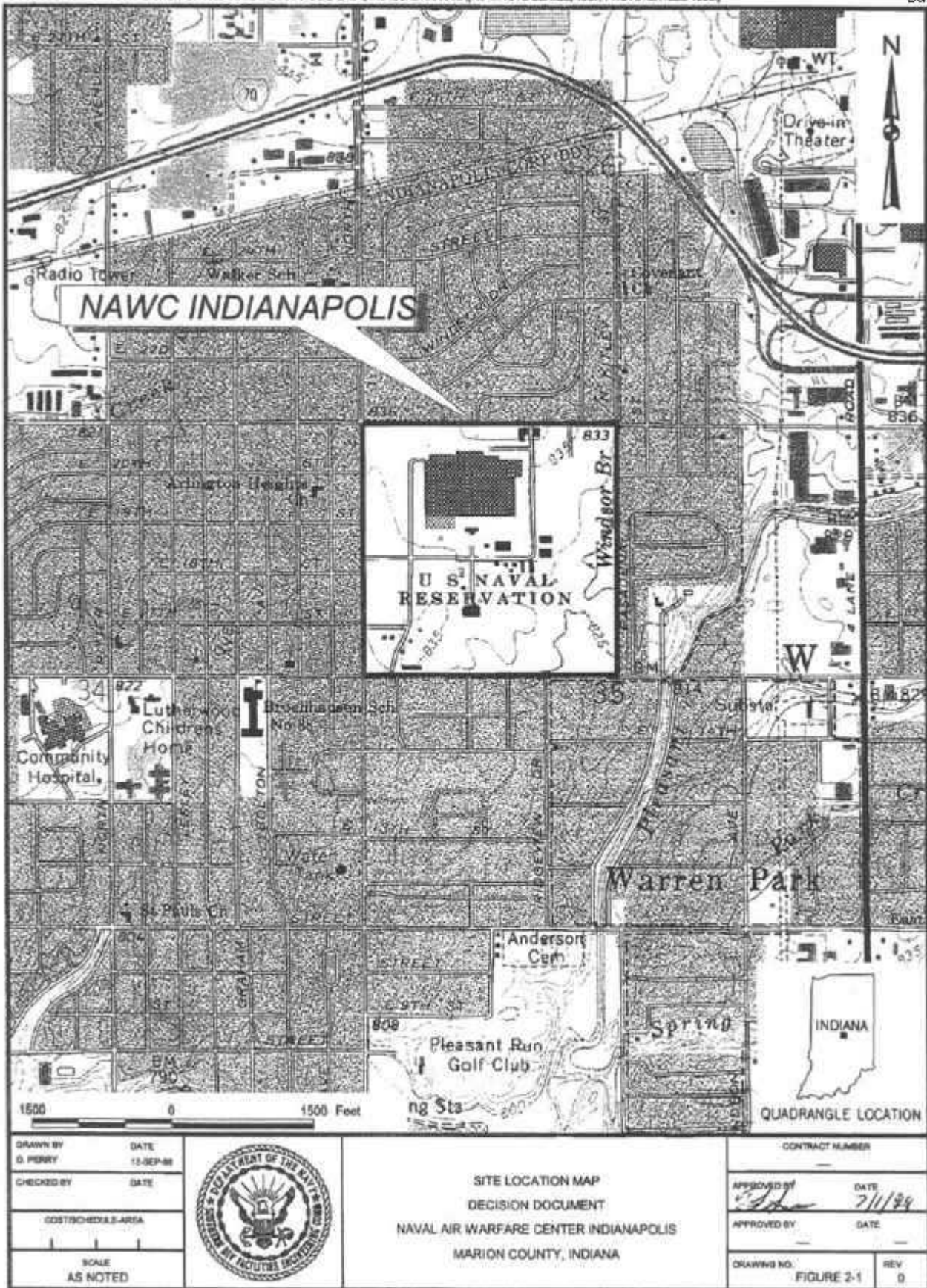
The ground surface at NAWC Indianapolis is generally flat, sloping slightly from the northern boundary toward the southeast. Surface water drainage at the facility mostly occurs as overland flow during heavy precipitation events. This overland flow is collected and routed through a storm sewer system to two discharge locations: (1) a nearby stream to the southeast of the facility via permitted spillways and an off-site storm sewer system; and (2) a water retention pond in the southwest portion of the site. The retention pond was constructed to facilitate surface water infiltration and to alleviate ponded water on the facility grounds.

The unconsolidated glacial overburden is approximately 150 feet thick at the facility and is comprised of three aquifers or aquifer zones, namely the shallow aquifer zone, middle aquifer and deep aquifer. Each of these varies in thickness, composition, and horizontal extent throughout the site area. The shallow aquifer may be unconfined or semi-confined in some areas where it is near to the ground surface or where it is not overlain by till or other aquifer ranges in thickness from 1 to 34 feet; and the deep aquifer ranges in thickness from 5 to 26 feet. The low permeability materials. The shallow aquifer ranges in thickness from 0.5 to 25 feet; the middle shallow and middle aquifers are only believed to be horizontally continuous on the eastern and southern portions of NAWC Indianapolis, whereas the deep aquifer is



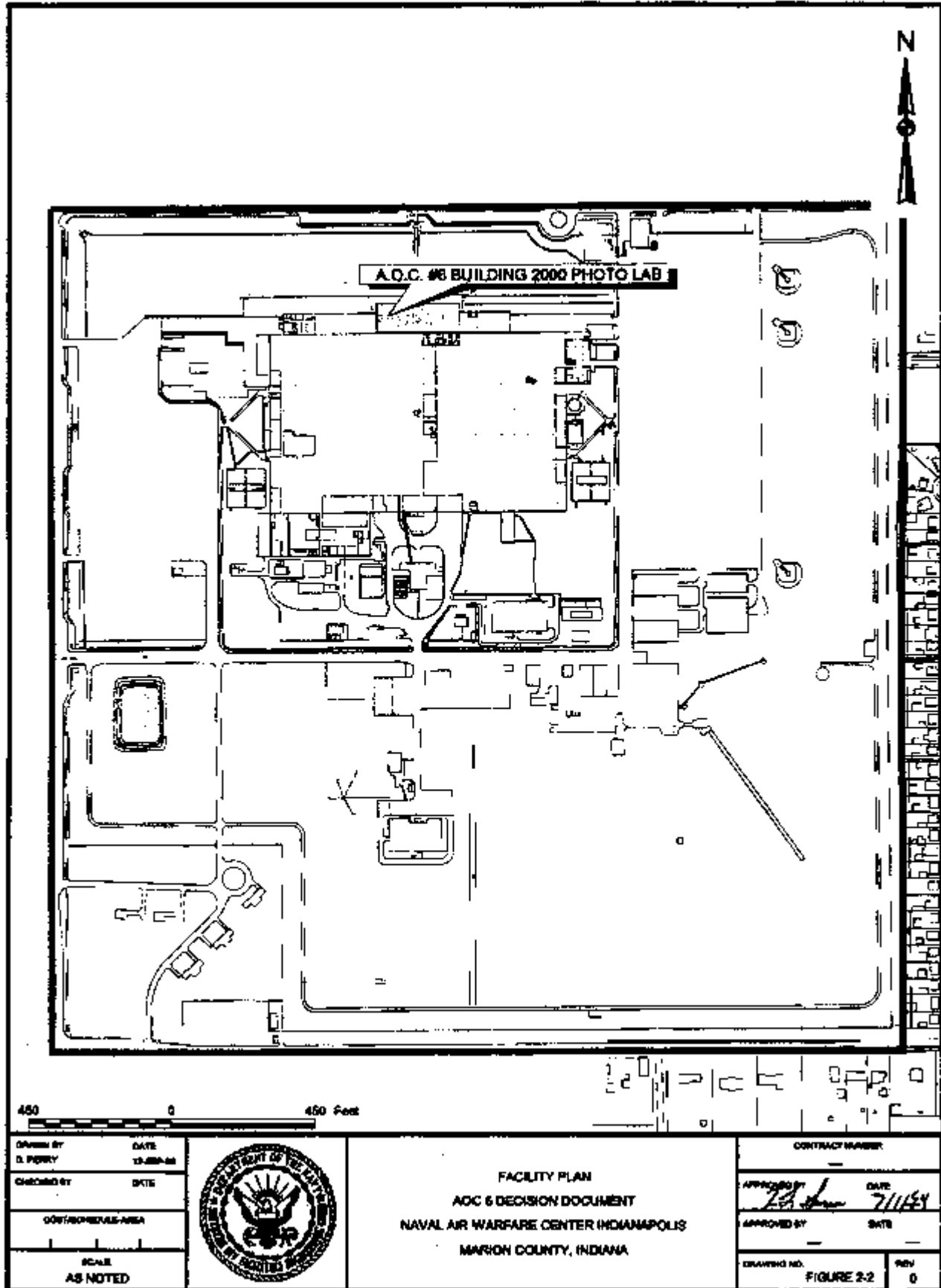
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SOURCE BASEMAP IS A PORTION OF THE USGS INDIANAPOLIS EAST, IND QUADRANGLE (7.5 MINUTE SERIES, 1967, PHOTOREVISED 1980.)



P:\GIS\71732173\_PROPOSED\_PLAN\APR 17-NOV-88 DRP LOCATION MAP LAYOUT

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P:\BBL\1720173 PROPOSED PLAN APR 17-NOV-99 DWP AREAS OF CONCERN 6 LAYOUT

expected to be horizontally continuous throughout the entire NAWC. Each of these aquifer zones are separated by low permeable glacial till aquitards. The aquitard between the shallow and middle aquifers ranges in thickness between 15 to 19 feet and the aquitard between the middle and deep aquifer ranges between 23 and 41 feet thick.

The groundwater flow direction across the facility in the shallow and middle aquifer zones is generally to the southeast and south, while flow in the deep aquifer is southwest. It is likely that groundwater in the shallow aquifer discharges into Windsor Branch and Pleasant Run to the east and southeast of the facility. The average horizontal hydraulic gradient for the shallow aquifer was 0.0071 ft/ft on December 10, 1996 and 0.0116 ft/ft on September 27, 1997. The average horizontal hydraulic gradient is 0.014 ft/ft in the middle aquifer, and 0.005 ft/ft in the deep aquifer. The average vertical gradient between monitoring wells screened in the shallow and middle aquifer is 0.5 ft/ft downward in the north-central and southern edges of the NAWC. Between the shallow and middle aquifers, the average vertical gradient in the northeastern corner of the NAWC is 0.13 ft/ft upward. This upward gradient indicates potential recharge of Windsor Branch immediately east of the NAWC from the shallow aquifer. The average hydraulic gradient between the middle and the deep aquifer is 1.3 ft/ft. For additional information on the geology and hydrogeology at the NAWC Indianapolis please refer to B&R Environmental (1997) and USGS (1997, 1998).

## **2.2 SITE HISTORY AND ENFORCEMENT ACTIVITIES**

The photography laboratory is located in the basement of Building 2000. Beginning in 1942, NAWC Indianapolis discharged silver laden photographic fixer solution to the sanitary sewers. The interior pipe walls are suspected to contain silver sludge deposits since maintenance activities typically create an analytical silver spike detectable downstream. The sewer integrity is unknown, but fixer solutions are not expected to be corrosive.

During the late 1970s or early 1980s, onsite silver capture equipment was installed to recover silver from the solutions prior to discharge of the reduced concentration solutions to the sewer. This equipment has been in place since then.

No historical data for the environmental condition of the area or the condition of the sewer is available.

The current condition of the area is typical of an operating photographic shop. The current floor slab appears sound, with no apparent large visual residues of spills or leaks.

The NAWC Indianapolis, under the office of the Chief of Naval Operations (CNO) initiated an Environmental Compliance Evaluation (ECE) program to identify environmental compliance deficiencies, provide recommendations for corrective action, and establish basis for future budgets. The first ECE was performed in October 1991. The next ECE was performed in 1994, at which time a total of 21 environmental media/program areas were evaluated. The ECE's are maintained on site. Environmental programs and procedures were typically updated to meet ECE deficiencies.

In anticipation of the transfer from the government to the private sector, an Environmental Baseline Survey (EBS) was prepared by Brown & Root (B&R) Environmental (March 1996) to document the results of a modified Phase I environmental site assessment. The site assessment was performed intended to be sold, leased, transferred or acquired. The EBS reported findings on the status of the NAWC Indianapolis property and off-base property based on visual inspections and a review of records.

The Remedial Investigation began with the collection of Phase I environmental samples from October through December 1996. Additional samples were added in September 1997. A Phase I Remedial Investigation report was issued in December, 1997 which presented the analytical results and evaluated the potential human health risks associated with the NAWC facility. Based on these findings, additional Phase II samples were collected at selected areas during the spring and summer of 1998.

## **2.3 HIGHLIGHTS OF COMMUNITY PARTICIPATION**

A Community Involvement Plan (CIP)(May 1997) was developed for NAWC Indianapolis that identifies a program to establish communication and information exchange between the Navy, and various federal, state and local agencies, and community agencies; and the public. Specifically, this provides a mechanism for the exchange of information between the BRAC Cleanup Team (BCT) and the public, primarily through the Restoration Advisory Board (RAB). The BCT and RAB periodically hold public meetings to provide full exchange of information and to provide an opportunity for public comment.

The Navy solicited input from the community for the proposed plan on the selected alternative for each response action. The Navy originally set a public comment period from September 28, 1998 to October 27, 1998, and later extended it until November 11, 1998 to encourage public participation in the selection process. The comment period included a public meeting at which the Navy, with the EPA and IDEM, presented the Proposed Plan, answered questions, and accepted both oral and written comments. The

public meeting was held on October 14, 1998 from 7:00 PM to 9:00 PM at the Quality Inn East at 3525 North Shadeland Avenue in Indianapolis.

As indicated by the public notices, all documents pursuant to AOC 6 were made accessible to the public at the information repository located at the Warren Branch Library, 9701 East 21<sup>st</sup> Street, Indianapolis, Indiana.

## **2.4 SCOPE AND ROLE OF ACTION**

The sites that required environmental investigations as part of the Remedial Investigation at NAWC Indianapolis comprised eighteen areas of concern and one Installation Restoration (IR) site. This Decision Document addresses one AOC: AOC 6 - Building 2000 Photography Laboratory. This AOC was determined in the RI to have no risk. This Decision Document identifies the AOC as a site requiring no further action. The AOC will be addressed independent of the other AOCs and the IR. The other AOCs will be addressed in other Decision Documents, and the basewide groundwater conditions will also be evaluated in a separate document

## **2.5 SUMMARY OF SITE CHARACTERISTICS**

### **2.5.1 Geology**

The geology of the AOC 6 is consistent with the geology found across the NAWC facility. Due to the shallow investigation depth, borings installed in AOC 6 only partially penetrated through the unconsolidated surficial fill and glacial deposits. Descriptions of the soil samples recorded on the boring logs indicated that across AOC 6, brown and gray silty clay with trace gravel was the predominant lithology encountered from the ground surface down to approximately 12 to 14 feet bgs.

### **2.5.2 Hydrogeology**

No permanent monitoring wells were installed at AOC 6, thus hydraulic gradients, groundwater flow directions or velocity could not be determined at this site. According to visual observations of the soil moisture content in subsurface soil samples, the water table was encountered between 12 and 14 feet bgs. Groundwater flow in the shallow aquifer is expected to mimic the relatively flat surface topography and flow to the southeast. It is believed that groundwater in the shallow aquifer will discharge into Pleasant Run.

### **2.5.3      Site Inspection of Building 2000: Photo Finishing Laboratory (AOC 6)**

On October 9, 1996 a preliminary floor and trench inspection was performed in the photo finishing lab, located in the basement of Building 2000. The purpose of the preliminary inspection was to determine the trench location and the logistics of performing the inspection. On November 14, 1996 a review of the design drawings of Building 2000 was performed.

The inspection revealed that there were not any trenches in the actual photo finishing lab. A sump in a closet across the hall from the laboratory serves the photo finishing laboratory and other Building 2000 areas. The A/E drawing indicates a concrete sump with hard piping, and pumped discharge to the sanitary sewer. These details could not be visually verified.

### **2.5.4      Nature and Extent of Contamination**

The FSP specified that an extensive floor survey of the Building 2000 photo laboratory area would be conducted in the vicinity of drains, floor trenches, and sumps, and that drains or sumps in the processing area would be hydrostatically tested.

The floor survey indicated that the floor was structurally sound, and that, in fact, no floor trenches or sumps have existed in this area. All process waste water is hard piped. There is no access to buried piping for hydrostatic testing, since piping tees into other pipes under the basement central hallway. The only sump present in all of Building 2000 is located across the hall from the photo processing area. The sump is for all basement wastewater, since the sanitary sewer in the area is at a higher elevation than the basement of Building 2000. The sump is located in a utility closet, and there was not sufficient space to provide access for direct push sampling. The sump also handles occasional groundwater infiltration.

The construction drawing from 1941 (Austin Drawing No. 116) indicates that the sump is concrete and is 6 feet deep. The construction drawing indicates that the photo processing area was originally a mailroom, and the drawing has not been revised to show any photo processes or tie-ins to the sewer. Therefore, this investigation is complete and satisfies the FSP although no samples were collected.



## **2.6 SUMMARY OF SITE RISKS**

The Field Sampling Plan (FSP) for the Remedial Investigation specified that an extensive floor survey of the Building 2000 photography laboratory area was to have been conducted in the vicinity of drains, floor trenches, and sumps, and that drains or sumps in the processing area would be hydrostatically tested.

The floor survey indicated that the floor was structurally sound, and that no floor trenches or sumps have existed in this area. All process wastewater is hard piped. There is no access to buried piping for hydrostatic testing, since piping tees into other pipes under the basement central hallway. The only sump present in Building 2000 is located across the hall from the photo processing area. The sump is for all basement wastewater, since the sanitary sewer in the area is at a higher elevation than the basement of Building 2000. The sump is located in a utility closet, and there was not sufficient space to provide access for direct push sampling. The sump also handles occasional groundwater infiltration.

Through investigation of the current facility and review of the construction drawings, no process sumps were identified. Similarly, no floor drains, trenches, or access points to the under-floor drain line were identified. The construction drawings did indicate that piping from the room runs south to the main sewer under the central hallway. The main sewer has tie-ins with sources from throughout the building. In this relatively short run, there are no floor drains, cleanouts, or other tie-ins. The entire main sewer discharges to the in-ground sump across the hall from the photo processing area from underground piping. Therefore, only a relatively short run of buried gravity flow pipe served the photo processing operation, and this was unable to be isolated for hydrostatic testing prior to tie-in to the Building 2000 main sewer.

The construction drawing from 1941 indicates that the sump is concrete and is 6 feet deep. The construction drawing indicates that the photo processing area was originally a mail room, and the drawing has not been revised to show any photo processes, or tie-ins to the sewer.

The physical configuration of the site did not justify sampling in the RI. Further, no potential sources of contamination nor pathways of migration could be observed. Therefore, no quantitative risk assessment was performed and there are no human health risks associated with this AOC.

No ecological risk evaluations were performed because the AOC is located within the building and ecological exposures are negligible.

Since this there are no risks to human health or the environment, no further action is necessary at this site.

## **2.7 DESCRIPTION OF ALTERNATIVES**

Because there are no risks associated with this site, no further action needs to be taken. Thus, no additional alternatives need to be considered. The preferred alternatives is a "No Action" alternative.

## **2.8 SUMMARY OF COMPARATIVE ANALYSIS OF ALTERNATIVES**

The preferred alternative for AOC 6 is No Action. Based on current information, this alternative conforms with the nine criteria that EPA uses to evaluate alternatives. This section profiles the performance of the preferred alternative against the nine criteria. The nine criteria are summarized below.

**Overall Protection of Human Health and Environment** addresses whether or not a remedy provides adequate protection and describes how risks posed through each pathway are eliminated, reduced or controlled through treatment, engineering controls or institutional controls.

**Compliance with ARARs** addresses whether or not a remedy will meet all of the Applicable or Relevant and Appropriate Requirements of other Federal and State environmental statutes and/or provide grounds for invoking a waiver.

**Long-term effectiveness and performance** refers to the magnitude of residual risk and the ability of a remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.

**Reduction of toxicity, mobility, or volume through treatment** is the anticipated performance of the treatment technologies that may be employed in a remedy.

**Short-term effectiveness** refers to the speed which the remedy achieves protection, as well as the remedy's potential to create adverse impacts on human health and the environment that may result during the construction and implementation period.

**Implementability** is the technical and administrative feasibility of a remedy, including the availability of materials and services needed to implement the chosen solution.

**Cost** includes capital and operations and maintenance costs.

**State Acceptance** indicates whether, based on its review of the RI and Proposed Plan, the State concurs with, opposes, or has no comment on the preferred alternative.

**Community Acceptance** indicates whether interested persons in the community support, have reservations about, or oppose the preferred alternative.

### 2.8.1 Analysis

**Overall Protection of Human Health and Environment.** Since there are no risks associated with the AOC, the alternative is protective of human health and the environment.

**Compliance with ARARs.** The preferred alternative is in compliance with Federal and State ARARs.

**Long-term effectiveness.** Since there are no risks associated with the AOC, the alternative is effective over the long term.

**Reduction of toxicity, mobility, or volume through treatment.** This criteria is not applicable because there are no contaminants to be removed.

**Short-term effectiveness.** Since there are no risks associated with the AOC, the alternative is effective in the short term.

**Implementability.** This criteria is not applicable because there is no action to implement.

**Cost.** The preferred alternative has no capital cost and no annual operations and maintenance costs.

**State Acceptance.** The preferred alternative is in compliance with State ARARs. The State has viewed the preferred alternative favorably.

**Community Acceptance** is described in Section 3.0 Responsiveness Summary.

### **2.8.2      Summary Of Preferred Alternative**

In summary, no action is required at the AOC because there are no risks. The alternative is protective of human health and the environment.

## **2.9            STATUTORY DETERMINATIONS**

The selected remedy is protective of human health and the environment, complies with Federal and State requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost-effective. This remedy utilizes permanent solutions and alternative treatment of the principal threats of the site was not found to be practical, this remedy does not satisfy the statutory preference for treatment as a principal element of the remedy. The size, location, and amount of contamination found at AOC 6 precludes a remedy in which contaminants would be treated effectively.

Because this remedy will result in contamination remaining on-site, the Navy will conduct a review every five years after the commencement of remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment.

### **3.0 RESPONSIVENESS SUMMARY**

A Proposed Plan for AOC 6 was issued in September, 1998. Subsequent to this, the Navy solicited input from the community on the selected alternative. The Navy set a public comment period from September 28, 1998 to October 27, 1998, which was later extended to November 11, 1998, to encourage public participation in the selection process. The comment period included a public meeting at which the Navy, with the EPA and IDEM, presented the Proposed Plan, answered questions, and accepted both oral and written comments. The public meeting was held on October 14, 1998 from 7:00 PM to 9:00 PM at the Quality Inn East at 3525 North Shadeland Avenue in Indianapolis. As indicated by the public notice for the meeting, all documents pertinent to AOC 6 were made available to the public at the information repository located at the Western Branch Library, 9701 East 21<sup>st</sup> Street, Indianapolis, Indiana.

#### **3.1 COMMUNITY PREFERENCES**

Comments were received from one person. The comments concurred with the deed restrictions to limit the land use to industrial but expressed concern that the land use could be changed to residential or permit day care facilities without extensive investigation. The comments were general and did not specify an AOC.

#### **3.2 INTEGRATION OF COMMENTS**

As these comments concurred with the selected remedies identified, no integration of these comments were warranted.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live*

*Frank O'Bannon*  
Governor

*John M. Hamilton*  
Commissioner

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November 17, 1998

Mr. Carl Loop  
SOUTHDIV NAVFACENGCOM  
2155 Eagle Drive  
North Charleston, SC 29419-9010

Dear Mr. Loop:

Re: IDEM staff comments regarding the Proposed  
Plans (PPs) for AOCs 1, 5, 6, 7, 8, 9, 15, 17,  
and 18

Staff of the Indiana Department of Environmental Management have reviewed the above referenced documents. Our review generated the following comments:

## **GENERAL COMMENTS:**

### Section 7.0 - Community Participation:

In paragraph 2, the third sentence should read: "The Proposed Plan meets the applicable or relevant and appropriate federal and state requirements." In addition, this section should explain how public comments will be addressed. Please verify if a copy of the administrative record is available at the Warren Branch Library. If this is not the case, delete the statement in the last paragraph of this section.

## **SPECIFIC COMMENTS:**

### **AOC 5:**

#### Section 2.2 - Site History:

The entire sanitary sewer line will be transferred. However, the sewer lines, and the land around the sewer lines (easement), is transferable if the sewer line is within the transfer parcel 1. Clarification in the text is needed.

#### Figure 2-2:

The hatched areas on the map represent the transferable soils around some parts of the sewer system. However, the legend on the figure does not reflect that. A statement explaining that fact is needed in the text of the PP.

Mr. Carl Loop  
Page 2

**AOC 7:**

Section 2.2 - Site History:

The entire sanitary sewer line will be transferred. However, the sewer lines, and the land around the sewer lines (easement) is transferable if the sewer line is within the transfer parcel 1. Clarification in the text is needed.

Figure 2-2:

The hatched areas on the map represent the transferable soils around some parts of the sewer system. However, the legend on the figure does not reflect that. A statement explaining that fact is needed in the text of the PP.

**CONCLUSION:**

It is IDEM staff's understanding that Institutional Control Plans (ICPs) will be attached to the Proposed Plans/Decision Documents. Once these ICPs are approved by IDEM and the U.S. EPA, IDEM staff will issue concurrence with the subject PPs. If you have any questions regarding the above comments, please contact me at (317) 308-3133.

Sincerely,



Gabriele Hauer, Project Manager  
Defense Environmental Restoration Program  
Office of Environmental Response

GHH:mg

cc: Rex Osborn, DERP, IDEM  
Denise Boone, U.S. EPA Region V  
Mark Sladic, Tetra Tech NUS  
Joe Logan, Tetra Tech NUS  
Alan Shoultz, Navy-Southdiv.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

SRF-5J

December 1, 1998

Carl Loop  
Department of the Navy  
SOUTHDIV NAVFACENGCOM  
Code 18E2BM  
2155 Eagle Drive  
Post Office Box 190010  
North Charleston, SC 29419-9010

**RE: *Proposed Plans for Areas of Concern 1, 5, 6, 7, 8, 9, 15, 17 and 18 for the Naval Air Warfare Center, Indianapolis, Indiana.***

Dear Mr. Loop:

The United States Environmental Protection Agency (USEPA) has reviewed the Proposed Plans for Areas of Concern (AOCs) 1, 5, 6, 7, 8, 9, 15, 17 and 18 for the Naval Air Warfare Center (NAWC), Indianapolis, Indiana. The preferred alternatives that the Navy has chosen for each of the AOCs are acceptable. However, the Navy must realize that there are costs associated with institutional controls (ICs) that are deed restrictions. The Navy must include an estimate of the costs for ICs.

The USEPA will not concur until the following are completed: the community acceptance of the preferred alternative, the Institutional Control Plan(s), and the finalized decision documents.

If the Navy as the lead agency reevaluates their preferred alternative for the AOCs, changes a component of the preferred remedy, or chooses to implement a remedy other than the preferred alternative, any such changes must be made in accordance with CERCLA Section 117(b).

If you have any questions concerning this letter, please feel free to contact me at (312) 886-6217.

Sincerely,

A handwritten signature in cursive script that reads "Denise Boone".

Denise Boone  
Remedial Project Manager

cc: Gabriele Hauer, IDEM





**TETRA TECH NUS, INC.**

661 Andersen Drive ■ Pittsburgh, Pennsylvania 15220-2745  
(412) 921-7090 ■ FAX (412) 921-4040 ■ [www.tetrattech.com](http://www.tetrattech.com)

PITT 03-9-043

March 5, 1999

Project Number 7173

Department of the Navy  
SOUTHNAVFACENGCOM  
ATTN: Carl Loop (Code 1871)  
2155 Eagle Drive  
North Charleston, South Carolina 29406

Reference: CLEAN Contract Number N62467-94-D-0888  
Contract Task Order 0012

Subject: Decision Documents for AOC 1  
Naval Air Warfare Center Indianapolis

Dear Mr. Loop:

In accordance with your request, please find enclosed three copies of the finalized Decision Document for AOC 1. The second part of the AOC 1 Decision Document submittal is the Institutional Control Manual and ICP for AOC 1. We believe the ICM is compliant with the most recent information provided by U.S. EPA. Upon regulatory concurrence, it is the Navy's intent to proceed as quickly as possible to complete the Decision Documents for the other AOCs in Parcel 1. These include AOCs 5, 6, 7, 8, 9, 15, 17, and 18.

Additionally, please see responses to IDEM comments. EPA said in a December 1, 1998 letter that they would not provide comments prior to community acceptance, completion of an ICP and finalized DD. The Navy feels these conditions have now all been met.

If you have any questions, feel free to call me at (412) 921-8216.

Sincerely,

Mark Sladic, P.E.  
Task Order Manager

MS/gp

Enclosures

cc: Gabriele Hauer, IDEM  
Denise Boone, USEPA  
Alan Shoultz (w/o enclosures)  
File 7173

**IDEM COMMENTS REGARDING PROPOSED  
PLANS (PPs) FOR AOCs 1,5,6,7,8, 9, 15, 17, and 18**

**GENERAL COMMENTS:**

1. **COMMENT:**      **Section 7.0 – Community Participation:** In paragraph 2, the third sentence should read: “The Proposed Plan meets the applicable or relevant and appropriate federal and state requirements.” In addition, this section should explain how public comments will be addressed. Please verify if a copy of the administrative record is available at the Warren Branch Library. If this is not the case, delete the statement in the last paragraph of this section.

**RESPONSE**

- a. The Navy agrees. This sentence in question some how got truncated and was missed. This will be corrected in the Decision Document.
- b. A paragraph stating how the public comments will be addressed is located at the top of page 7-2. This is compliant with the EPA ROD guidance. No changes to the text are necessary.
- c. A copy of the Administrative Record is located in the Warren Branch Library.

**SPECIFIC COMMENTS:**

**AOC5:**

1. **COMMENT:**      **Section 2.2 – Site History:** The entire sanitary sewer line will be transferred. However, the sewer lines, and the land around the sewer lines (easement), is transferable if the sewer line is within the transfer parcel 1. Clarification in the text is needed.

**RESPONSE:**      The Navy agrees. This paragraph will be re-written to clarify this issue in the Decision Document.

2. **COMMENT Figure 2.2.**      The hatched areas on the map represent the transferable soils around some parts of the sewer system. However, the legend on the figure does not reflect that. A statement explaining that fact is needed in the text of the PP.

**RESPONSE:**      The Navy agrees. A statement will be added to the text to explain the hatched areas on Figure 2-2. This change will be reflected in the Decision Document.

**AOC 7:**

1. **COMMENT:**      **Section 2.2 – Site History:** The entire sanitary sewer line will be transferred. However, the sewer lines and the land around the sewer lines (easement) is transferable if the sewer line is within the transfer parcel 1. Clarification in the text is needed.

**RESPONSE:**      The Navy Agrees. This paragraph will be re-written to clarify this issue in the Decision Document.

2. **COMMENT:**        **Figure 2-2:**    The hatched areas on the map represent the transferable soils around some parts of the sewer system. However, the legend on the figure does not reflect that. A statement explaining that fact is needed in the text of the PP.

**RESPONSE:**        The Navy agrees. A statement will be added to the text to explain the hatched areas on Figure 2-2. This change will be reflected in the Decision Document.



**TETRA TECH NUS, INC.**

661 Andersen Drive ■ Pittsburgh, Pennsylvania 15220-2745  
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PITT 08-9-050

August 6, 1999

Project Number 7173

Department of the Navy  
SOUTHNAVFACENGCOM  
ATTN: Carl Loop (Code 1871)  
2155 Eagle Drive  
North Charleston, South Carolina 29406

Reference: CLEAN Contract Number N62467-94-D-0888  
Contract Task Order 0012

Subject: Decision Documents for Parcel 1  
Naval Air Warfare Center Indianapolis

Dear Mr. Loop:

Please find enclosed three copies of change pages for the Parcel 1 AOCs.

1. **Instructions for the material attached to this letter:** Pursuant to their letter dated July 28, regarding the Decision Documents for this site, the EPA has requested that a copy of the USEPA's and the Indiana Department of Environmental Management's. (IDEM) comments on the proposed plan/DD and the Navy's responses to the comments be included with these documents. Therefore, please replace the following pages:

- The updated table of contents (identifying Section 3.3 Comment Resolution), and,
- Page 3-1

Following Page 3-1, please insert the pages following the title page 'USEPA and IDEM Comments and Resolutions.' Note that the content of each group is identical, however the contents page and page 3-1 contain a header in the upper right corner which indicate which section the change pages should be inserted in.

As the remedy for AOC 6 and AOC 8 are 'no further action', these AOCs do not have change pages. This is consistent with EPA's July 28 letter.

2. **Schedule:** The Navy believes that the absence of these comment letters has not presented a material hurdle to completion of the regulatory review for these documents. The team schedule specified that following a 30-day regulatory review period, the date of concurrence on the Decision Documents was to be August 5. The Navy would appreciate if the EPA can now remove the signature pages from one set of the Decision Documents and sign these in the appropriate locations. Afterwards, please forward

Mr. Carl Loop  
SOUTHNAVFACENGCOM  
August 6, 1999 – Page Two

these to the IDEM for signature. Following IDEM signature, the Navy requests that IDEM please forward them to Southdiv, attention Carl Loop, for final signature. When Southdiv returns the signed pages to us, we will provide copies for inclusion in all outstanding sets of Decision Documents.

If you have any questions, feel free to call me at (412) 921-8216.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Sladic". The signature is fluid and cursive, with the first name "Mark" and last name "Sladic" clearly distinguishable.

Mark Sladic, P.E  
Task Order Manager

MS/kf

Enclosures

cc: Sean Grady, IDEM (w/enclosure)  
Gary Schafer, USEPA (w/enclosure)  
Alan Shoultz (w/o enclosures)  
Mark Perry, TtNUS (w/enclosure)  
Debra Wroblewski/DER, TtNUS (w/o enclosures)



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August 17, 1999

Mr. Carl Loop  
Department of the Navy  
SOUTHDIV NAVFACENGCOM  
Code 18E2BM  
2155 Eagle Drive  
Post Office Box 190010  
North Charleston, SC 29419-9010

Dear Mr. Loop:

Re: Decision Document for Areas of Concern  
#5, 6, 7, 8, 9, 15, 17, and 18 for the Naval  
Air Warfare Center, Indianapolis, Indiana

Staff of the Indiana Department of Environmental Management (IDEM) have reviewed the above referenced document and has determined that it is acceptable providing the Navy address the following comments:

**GENERAL COMMENT**

An executive summary should be incorporated to give the readers an understanding of what this document is and why it was developed. Also, the title of this report should be changed to more accurately reflect the parcel name.

**SPECIFIC COMMENTS**

**AOC 6, Page 2-13, Section 2.9:** Some language in this section is not needed. Since there was no contamination, no risk, and no action is required for this AOC, the second sentence in the first paragraph continuing through the end of the page should be removed. Revision of this section may be needed.

**AOC 8, Page 2-13, Section 2.9:** Again, some language in this section is not needed. Since there was no contamination, no risk, and no action is required for this AOC, the third sentence in the first paragraph continuing through the end of the page should be removed. Revision of this section may be needed.

Mr. Carl Loop  
Page 2

If you have any questions concerning this letter, please feel free to contact me at (317) 308-3121.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean K. Grady". The signature is fluid and cursive, with the first name "Sean" and last name "Grady" clearly distinguishable.

Sean K. Grady, Project Manager  
Federal Programs Section  
Office of Environmental Response

SKG:mg

cc: Alan Shoultz, SOUTHDIV  
Mark Sladic, Tetra Tech NUS  
Denise Boone, U.S. EPA

## REFERENCES

B&R Environmental, March 1996, Environmental Baseline Survey - Naval Air Warfare Center Indianapolis, Indiana.

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Supporting documents: Field Sampling Plan  
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